

US DISTRICT COURT SOUTHERN DISTRICT OF ILLINOIS

Anthony Gay

Plaintiff

No.

**FILED**

JAN - 7 2011

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

vs.

Carol Blackman And Claudia Kautigian

Defendants

11-14-JPG

CAUSE OF ACTION FOR DELIBERATE INDIFFERENCE TO  
SERIOUS MENTAL HEALTH NEEDS AND INTENTIONAL  
INFLECTION OF EMOTIONAL DISTRESS

Now comes plaintiff Anthony Gay filing this cause of  
action "under imminent danger" for Deliberate Indifference  
to serious mental health needs and Intentional Inflection  
of Emotional distress (state tort claim) and states  
as follows:

(1) I, Anthony Gay am the plaintiff in this cause of  
action and was at all times pertinent an inmate in  
Tamms Correctional Center.

(2) The Defendant Carol Blackman is a licensed social  
worker at Tamms Correctional Center and was at all  
times pertinent a licensed social ~~worker~~ worker  
at Tamms Correctional Center.

(3) The Defendant Claudia Kautigian is a psychiatrist  
at Tamms Correctional Center and was at all times

pertinent a psychiatrist at tenns correctional center.

## COUNT I DELIBERATE INDIFFERENCE TO SERIOUS MENTAL HEALTH NEEDS

(4) The defendant Bladen is aware that plaintiff frequently self-mutilates himself. And is in need of a psychiatric evaluation.

(5) The Deliberate Indifference of the defendant Bladen to the serious mental health needs of plaintiff is demonstrated by a series of incidents of mistreatment occurring closely together in time. And the defendant Bladen refuses to refer plaintiff for a psychiatric evaluation.

(6) On May 11, 2010 defendant Bladen made lobby rounds. The plaintiff informed defendant Bladen he was becoming anxious and agitated and needed to see the psychiatrist because his anxiety was building up. He needed some medication. Defendant Bladen refuses to refer plaintiff to see the psychiatrist.

(7) On June 3, 2010 defendant Bladen made lobby rounds. The plaintiff informed Bladen his anxiety was becoming overwhelming. He was on the verge

of cutting himself, he needed to see the psychiatrist.  
Blackman refused to refer plaintiff to see the psychiatrist.

(8) On June 7, 2010 plaintiff became extremely agitated,  
Anxious and nervous and cut his neck and testicles.

(9) On June 10, 2010 defendant Blackman made rounds. Plaintiff  
informed defendant Blackman he needed to see the  
psychiatrist about his anxiety. Defendant Blackman refused  
to refer plaintiff to see the psychiatrist.

(10) On June 17, 2010 defendant Blackman made weekly rounds.  
Plaintiff informed defendant Blackman he needed to see  
the psychiatrist about his anxiety. Defendant Blackman  
refused to refer plaintiff to see the psychiatrist.

(11) On June 22, 2010 defendant Blackman made weekly rounds.  
Plaintiff informed defendant Blackman about his anxiety  
problems and the medication Buspar helps plaintiff  
cope. Defendant Blackman stated, "you're not getting  
Buspar! And you're not being referred to the  
psychiatrist!"

(12) On June 29, 2010 defendant Blackman made weekly rounds.  
Plaintiff informed defendant Blackman he needed to

SEE the psychiatrist About his Anxiety And medication.  
Defendant Blackman refused to refer plaintiff to SEE  
the psychiatrist.

(13) on July 4, 2010 plaintiff became agitated and anxious  
And cut his inner thigh.

(14) on July 10, 2010 plaintiff became agitated and anxious  
And cut his upper thigh.

(15) on July 28, 2010 plaintiff became agitated And anxious  
And informed defendant Blackman he needed to SEE the  
psychiatrist; He was going to cut himself. Defendant  
Blackman smiled and stated, "Go for it."

(16) on August 8, 2010 the defendant Blackman made  
weekly rounds. Plaintiff requested to be referred to  
psychiatrist for his mental health issues. The Defendant  
Blackman refused to refer plaintiff to the psychiatrist.

(17) on August 11, 2010 plaintiff informed defendant Blackman  
his anxiety was becoming overwhelming he needed to  
SEE the psychiatrist And that he was going to hurt  
himself because he was upset he didn't get to  
SEE his daughter. Defendant Blackman smiled and

stated, "Write her a letter," then walked off.

(18) on August 12, 2010 plaintiff inflicted a 5" cut on his right thigh and a 4" cut on his left hip requiring sutures.

(19) on August 26, 2010, plaintiff informed defendant Blackman he needed to see the psychiatrist to be evaluated to determine if medication would be appropriate to help him cope with his stress, anger and anxiety. Defendant Blackman stated, "you're not seeing the psychiatrist! you can participate in correspondence clinic or nothing! take it or leave it!"

(20) on August 27, 2010 plaintiff cut his thigh and subsequently mutilated his ~~testicles~~ testicles, and tied it to the door.

(21) plaintiff is at a continuous risk to self-mutilate himself and a continuous risk to commit suicide.

## COUNT II INTENTIONAL INFLECTION OF EMOTIONAL DISTRESS (state tort claim)

(22) plaintiff alleges paragraphs 1<sup>st</sup> thru 21<sup>st</sup>

### COUNT III DELIBERATE INDIFFERENCE TO SERIOUS MENTAL HEALTH NEEDS

(23) The plaintiff has not been examined, evaluated or assessed by the defendant Knutson (psychiatrist) since March 2010.

(24) Over the past nine months - March 2010 thru December 2010 the plaintiff has self-mutilated himself, including cutting his neck, thighs and testicles. His self-mutilation has been severe. He has even mutilated his testicle and tied it to the door. The defendant Knutson is well aware of plaintiff's self-mutilation.

(25) The plaintiff since April 24, 2010 has submitted multiple written request to be examined, evaluated and assessed by the defendant Knutson (psychiatrist) which she has received and acknowledged but refuses to examine, evaluate or assess plaintiff.

(26) The plaintiff is at a continuous risk to self-mutilate himself and commit suicide and the defendant Knutson is ~~ignoring~~ maliciously and sadistically ignoring plaintiff's mental health needs.

COUNT IV INTENTIONAL INFLICTION OF  
EMOTIONAL DISTRESS (state tort claim)

(27) Plaintiff is alleged photographs 23<sup>rd</sup> thru 26<sup>th</sup>

RELIEF REQUESTED

A. That plaintiff be examined by an ~~and~~ independent  
psychiatrist to determine his mental health needs.  
(injunctive relief)

B. That plaintiff be awarded compensatory and punitive  
damages.

Respectfully

LSI hy

Anthony Guy Bazzie  
8500 Supreme road  
Tomball, TX 77375

State of Illinois

AFFIDAVIT

I, Anthony Guy, being duly sworn under oath state  
that I am the plaintiff in this cause of action  
and state the contents thereof are true and correct  
to the best of my knowledge.

LSI hy

CERTIFICATE OF SERVICE

This certifies I sent the above instrument  
to the U.S. District Southern District Clerk of  
Court via mail on 1-5-11 and a copy for each  
defendant

151 hjj  
Anthony Long Belleri  
8500 Supreme Road  
Tomball, TX 77455